

QUESTION 1

Was there a defect in the warnings or instructions at the time the subject Safety 1st Summit Deluxe car seat left the possession of Dorel Juvenile Group, Inc., which defect was a producing cause of the injury in question?

Answer "Yes" or "No."

Answer: Yes

If you answered "YES" to Question 1, then continue to Question 2. If you answered "NO" to Question 1, then you do not need to proceed further, and you should return this verdict to the Court without answering any other questions.

QUESTION 2

Was Dorel Juvenile Group, Inc. negligent in warning or instructing regarding use of the subject Safety 1st Summit Deluxe car seat at the time it left Dorel Juvenile Group, Inc., and was that negligence, if any, a proximate cause of the injury in question?

Answer "Yes" or "No."

Answer: Yes

If you answered "YES" to either Question 1 or 2, then continue to Question 3.

QUESTION 3

Did the negligence, if any, of those named below proximately cause the injury in question?

Answer "Yes" or "No" for each of the following:

Wal-Mart Stores, Inc.

NO

Stacey Tilley

Yes

Nicole Hinson

No

Proceed to Question 4.

QUESTION 4

If you answered "YES" to Question 1 or 2 as to Dorel Juvenile Group, Inc. AND answered "YES" for any party listed in Question 3, then answer the following question. If you answered "NO" to each person or entity listed in Question 3, then do not answer this question, and instead, proceed to Question 5.

Assign percentages of responsibility only to those you found caused or contributed to cause the injury. The percentages you find must total 100 percent. The percentages must be expressed in whole numbers.

For each party or product found by you to have caused the *injury*, find the percentage caused by:

Dorel Juvenile Group, Inc.

80 %

Wal-Mart Stores, Inc.

0 %

Stacey Tilley

20 %

Nicole Hinson

0 %

Total

100 %

QUESTION 5

What sum of money, if paid in cash, would provide fair and reasonable compensation for C.H.'s injuries, if any, that resulted from the occurrence in question?

1. Physical pain and mental anguish sustained in the past by C.H.

Answer: 100,000

2. Physical pain and mental anguish that, in reasonable probability, C.H. will sustain in the future.

Answer: 4,000,000

3. Loss of earning capacity that, in reasonable probability, will be sustained by C.H. in the future from the time of trial until C.H. reaches the age of eighteen years.

Answer: 15,000

4. Loss of earning capacity that, in reasonable probability, will be sustained by C.H. in the future after C.H. reaches the age of eighteen years.

Answer: 1,200,000

5. Disfigurement sustained in the past by C.H.

Answer: 100,000

6. Disfigurement that, in reasonable probability, C.H. will sustain in the future.

Answer: 3,000,000

7. Physical impairment sustained in the past by C.H.

Answer: 100,000

8. Physical impairment that, in reasonable probability, C.H. will sustain in the future.

Answer: 3,000,000

9. Medical care expenses incurred in the past on behalf of C.H.

Answer: 73,000

10. Medical care expenses that, in reasonable probability, will be incurred on behalf of C.H. in the future from the time of trial until C.H. reaches the age of eighteen years.

Answer: ~~4,700,000~~¹⁰²⁸ 350,000

11. Medical care expenses that, in reasonable probability, C.H. will incur after he reaches the age of eighteen years.

Answer: ~~4,700,000~~¹⁰²⁸ 12,500,000

QUESTION 6

Answer the following question regarding Defendant Dorel Juvenile Group, Inc. only if you answered "YES" to Question 1 or Question 2. Otherwise, do not answer the following question.

Do you find by clear and convincing evidence that the harm to C.H. resulted from gross negligence of Dorel Juvenile Group, Inc.?

Answer "Yes" or "No."

Answer: Yes

Signed this 17 day of June, 2016

JURY FOREPERSON